

## Exhibit A

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

FRANKLIN WHITE,

Plaintiff,

v.

Civil Action No. 1:13-CV-1163-TCB

ALCON FILM FUND, LLC, ALCON  
ENTERTAINMENT, LLC, CUBE  
VISION, INC., WARNER BROS.  
PICTURES, AND TIME WARNER,  
INC.,

Defendants.

**DEFENDANTS ALCON FILM FUND, LLC, ALCON  
ENTERTAINMENT, LLC, CUBE VISION, INC., WARNER BROS.  
PICTURES, AND TIME WARNER INC.'S INITIAL DISCLOSURES  
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)**

Defendants Alcon Film Fund, LLC, Alcon Entertainment, LLC, Cube Vision, Inc., Warner Bros. Pictures, a division of WB Studio Enterprises Inc., and Time Warner Inc., erroneously sued herein as Time Warner, Inc., (collectively, "Defendants") hereby submit the following Initial Disclosures pursuant to *Federal Rules of Civil Procedure, Rule 26(a)(1)*.

**1. Identity of Defendants' Potential Witnesses**

a) Erik White;

i. Topics:

1. Creation of the concept for the motion picture “Lottery Ticket” (the “Picture”);
2. Development of the concept for the Picture;
3. Drafting of the screenplay for the Picture (the “Screenplay”);
4. Drafting of the treatment for the Screenplay (the “Treatment”);
5. Production of the Picture;
6. The Picture; and
7. Lack of knowledge of and familiarity with Plaintiff Franklin White (“Plaintiff”) and his book “First Round Lottery Pick” (the “Book”).

ii. Contact information:

1. Sauer & Wagner LLP, 1801 Century Park East, Suite 1150, Los Angeles, CA 90067; and
2. (310) 712-8100.

b) Abdul Williams;

i. Topics:

1. Drafting of the Screenplay;
2. Drafting of the Treatment;
3. Production of the Picture;
4. The Picture; and
5. Lack of knowledge of and familiarity with Plaintiff and the Book.

ii. Contact information:

1. Sauer & Wagner LLP, 1801 Century Park East, Suite 1150, Los Angeles, CA 90067; and
2. (310) 712-8100.

c) Brad Kaplan

i. Topics:

1. Conversations with Erik White and other non-parties pre-dating the Book's publication concerning the concept for the Picture, the Treatment, and the Screenplay;
2. Development of the concept for the Picture; and
3. Correspondence with non-parties pre-dating the Book's publication concerning the concept for the Picture, the Treatment, and the Screenplay.

ii. Contact information:

1. Sauer & Wagner LLP, 1801 Century Park East, Suite 1150, Los Angeles, CA 90067; and
2. (310) 712-8100.

d) Andrew Wilson

i. Topics:

1. Conversations with Erik White and other non-parties pre-dating the Book's publication concerning the concept for the Picture, the Treatment, and the Screenplay;
2. Development of the concept for the Picture; and
3. Correspondence with non-parties pre-dating the Book's publication concerning the concept for the Picture, the Treatment, and the Screenplay.

ii. Contact information:

1. Sauer & Wagner LLP, 1801 Century Park East, Suite 1150, Los Angeles, CA 90067; and
2. (310) 712-8100.

e) Dave Hebenstreit

i. Topics:

1. Submission of a screenplay entitled “Grown Folk, a Hip Hop Musical” to Cube Vision, Inc. (“Cube Vision”) by Plaintiff;
2. The Picture; and
3. Unsolicited submission of the Book to Cube Vision.

ii. Contact information:

1. Sauer & Wagner LLP, 1801 Century Park East, Suite 1150, Los Angeles, CA 90067; and
2. (310) 712-8100.

f) Matt Alvarez

i. Topics:

1. Revisions to the Screenplay;
2. The Picture;
3. Lack of knowledge of and familiarity with Plaintiff and the Book; and
4. Production of the Picture.

ii. Contact information:

1. Sauer & Wagner LLP, 1801 Century Park East, Suite 1150, Los Angeles, CA 90067; and
2. (310) 712-8100.



g) O'Shea Jackson, professionally known as Ice Cube

i. Topics:

1. Revisions to the Screenplay;
2. The Picture;
3. Lack of knowledge of and familiarity with Plaintiff and the Book; and
4. Production of the Picture.

ii. Contact information:

1. Sauer & Wagner LLP, 1801 Century Park East, Suite 1150, Los Angeles, CA 90067; and
2. (310) 712-8100.

**2. Documents Defendants' May Use to Support Their Claims or Defenses**

- a) The Treatment;
- b) Drafts of the Screenplay;
- c) The Screenplay;
- d) The Shooting Script;
- e) The 2005, 2009, and 2010 versions of the Book;
- f) Correspondence pre-dating the Book's publication concerning the concept for the Picture, the development of the Picture, the Treatment, and the Screenplay;
- g) Relativity Rogue, LLC Writer's Agreement; and
- h) The Picture.

**3. Computation of Damages**

- a) Not applicable.

4. **Insurance**

- a) Pursuant to Mediaguard by Chubb Liability Policy No. 8212-1989, Defendants have tendered this matter to Federal Insurance Company, which has accepted coverage subject to a reservation of rights.

Respectfully submitted this 24<sup>th</sup> of September, 2013.

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**Attorneys for Defendants**

Alcon Entertainment, LLC, Alcon Film Fund, LLC, Warner Bros. Pictures, Cube Vision, Inc. and Time Warner Inc. erroneously sued herein as Time Warner, Inc.

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

The undersigned counsel hereby certifies that this pleading was prepared using one of the font and point selections approved by this Court in Local Rule 5.1C. Specifically, Times New Roman font was used in 14 point.

BY: Gerald L. Sauer  
Gerald L. Sauer (Cal. Bar No. 113564)  
gsauer@swattys.com



**CERTIFICATE OF SERVICE**

I am employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the within action. My business address is 1801 Century Park East, Suite 1150, Los Angeles, California 90067.

On September 24, 2013, I served the following document(s) described as: **DEFENDANTS ALCON FILM FUND, LLC, ALCON ENTERTAINMENT, LLC, CUBE VISION, INC., WARNER BROS. PICTURES, AND TIME WARNER INC.'S INITIAL DISCLOSURES PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)** on the interested party(ies) in this action, enclosed in a sealed envelope, addressed as follows:

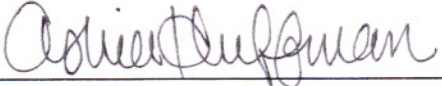
Alan S. Clarke, Esq.  
The Entertainment Law Group  
Alan S. Clarke & Associates, LLC  
3355 Lenox Road, Suite 750  
Atlanta, Georgia 30326

Gary Freed, Esq.  
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- (X) I am readily familiar with the business practice for collection and processing of correspondence for mailing within the United States Postal Service. I know that the correspondence is deposited with the United States Postal Service on the same day this declaration was executed in the ordinary course of business. I know that the envelope was sealed and with postage thereon fully prepaid, placed for collection and mailing on this date, following ordinary business practices in the United States mailed at Los Angeles, California.

Executed this 24<sup>th</sup> day of September, 2013, at Los Angeles, California.

- ( ) (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
- (X) (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

  
Ashia Huffman